

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: TRACY NEAL ROBINSON  
Debtor

CHAPTER 11  
CASE NO. 22-02414-KMS

NOTICE

NOTICE IS HEREBY GIVEN that the Debtor herein has filed its *Motion for Authority to Sell Real Property, Outside the Ordinary Course of Business Free and Clear of Liens, Claims and Interests* (the "Motion"), a copy of which Motion is attached hereto as Exhibit "A".

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Motion must file a written objection or other responsive pleading within twenty-one (21) days from and after the date of this Notice, with the Clerk of the Court, Mr. Danny L. Miller, the Clerk of the U. S. Bankruptcy Court, Southern District of Mississippi, Dan M. Russell, Jr. U.S. Courthouse, 2012 15<sup>th</sup> Street, Suite 244, Gulfport, MS 39501, and a copy of any objection must be served upon Craig M. Geno, Esq., Law Offices of Craig M. Geno, PLLC, counsel for the Debtor, at 587 Highland Colony Parkway, Ridgeland, MS 39157. Attorneys and other registered users of the Case Management/Electronic Case Filing (CM/ECF) system shall file any such obligation electronically. In the event an objection to this Motion is filed, it will be scheduled for hearing in due course.

SO NOTICED, this the 6<sup>th</sup> day of July, 2023.

Respectfully submitted,

TRACY NEAL ROBINSON

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
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**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: TRACY NEAL ROBINSON  
Debtor**

**CHAPTER 11  
CASE NO. 22-02414-KMS**

**MOTION FOR AUTHORITY TO SELL REAL PROPERTY  
OUTSIDE THE ORDINARY COURSE OF BUSINESS  
FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS**

COMES NOW Tracy Neal Robinson (the “Debtor”) and files this his *Motion For Authority to Sell Real Property Outside the Ordinary Course of Business Free and Clear of Liens, Claims and Interests* (the “Motion”), and in support thereof, would respectfully show unto the Court as follows, to-wit:

1. On November 16, 2022, the Debtor herein filed with this Court his Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code.
2. This Honorable Court has jurisdiction of the subject matter herein and the parties hereto pursuant to 28 U.S.C. § 157, 1334; 11 U.S.C. § 105, 363, 541, 1107, related statutes, related rules and various orders of reference. This is a core proceeding.
3. In the exercise of the Debtor’s best business judgment, the Debtor has made the decision to liquidate certain real property in an effort to generate credits to pay the indebtedness of secured creditors.
4. Specifically, the property that forms the subject matter of this Motion is 68 +/- acres located at 540 SCR 88 in Mize, Mississippi (the “Property”). The Debtor is retaining 10 acres of the property and the mobile home located on the 10 acres on which to live.
5. The decision to liquidate the Property is in the best interest of all creditors and parties in interest herein. The purchaser for the Property is Kody Sullivan (the “Purchaser”). The purchase

**EXHIBIT “A”**

price for the Property is \$550,000. This is the fair market value of the Property. The terms of the sale are cash upon Court approval of the Motion after the sale order is final.

6. The Purchaser is a good faith purchaser and the sale transaction is an arms-length transaction.

7. The ad valorem taxes will be prorated at closing on the Property based on possession as between the Purchaser and the Debtor.

8. The Debtor seeks authority of the Court to consummate the sale, fulfill the terms of the agreement and then to execute such deed, transfer of title or other related documents which are reasonably necessary to consummate and close the sale of the Property.

9. The Debtor seeks to sell the Property free and clear of liens, claims and security interests with the exception of ad valorem tax claims which shall be prorated based upon possession, and paid at closing, and with the exception of customary seller's costs of closing, with all valid liens and claims to attach to the sales proceeds and paid to Community Bank, the first and only lienholder on the Property.

10. The Debtor requests that the Court approve the sale for the fair, reasonable, and appropriate contract price of \$550,000.

11. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof, this Honorable Court will grant the Motion and authorize the Debtor to sell his interests in the Property free and clear of liens, claims and interests. Debtor prays for general relief.

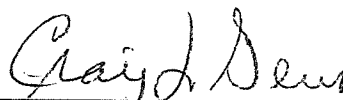
THIS, the 6<sup>th</sup> day of July, 2023.

Respectfully submitted,

TRACY NEAL ROBINSON

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
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### CERTIFICATE OF SERVICE

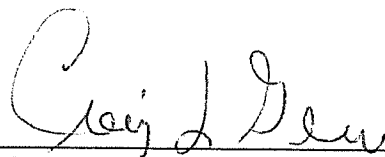
I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Sr., Esq.  
Office of the United States Trustee  
[Christopher.j.steiskal@usdoj.gov](mailto:Christopher.j.steiskal@usdoj.gov)

Stephen E. Gardner, Esq.  
[steve.gardner@youngwilliams.com](mailto:steve.gardner@youngwilliams.com)

Kimberly D. Strong  
Subchapter V Trustee  
[kstrong@hrkcpa.com](mailto:kstrong@hrkcpa.com)

THIS, the 6<sup>th</sup> day of July, 2023.

  
Craig M. Geno